

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:

FIELDWOOD ENERGY LLC, et al.,

Debtors.¹

Case No. 20-33948 (MI)

(Chapter No. 11)

(Jointly Administered)

**MOTION TO WITHDRAW AS COUNSEL
OF RECORD AND REQUEST FOR WITHDRAWAL FROM
THE COURT'S CM/ECF NOTICES OF FILING FOR THIS ACTION**

Emma L. Persson ("Movant"), moves to withdraw as counsel for Shell Offshore, Inc. ("Shell Offshore"), Shell Oil Company ("Shell Oil"), Shell GOM Pipeline Company, LLC ("Shell GOM") and Shell Pipeline, LLC ("Shell Pipeline") (collectively, "Shell"), creditors and parties-in-interest in the above-captioned bankruptcy case, and to withdraw from receiving Notices of Electronic Filing from the Court's CM/ECF filing system for this action and in support thereof state as follows:

1. Movant is an attorney of record for Shell in this action.
2. As of July 28, 2021, Movant is no longer employed with the law firm of Norton Rose Fulbright US LLP and thus seeks to withdraw as counsel of record for Shell.
3. Shell will continue to be represented by Ryan E. Manns of Norton Rose Fulbright

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

US LLP, located at 2200 Ross Avenue, Suite 3600 Dallas, Texas 75201-7932.

4. Movant has found good cause to withdraw as counsel for Shell, given that Movant is no longer with Norton Rose Fulbright US LLP, the firm representing Shell, and Shell's representation otherwise remains unchanged.

5. Shell has been notified of this Motion and has been informed that, upon its granting, Movant will no longer represent Shell.

6. No party will be prejudiced by the requested withdrawal given the current status of the case.

7. Movant respectfully requests that she be withdrawn from receiving the Notices of Electronic Filing from the Court's CM/ECF filing system for this action.

8. A Proposed Order granting Movant's Motion to Withdraw as Counsel of Record and withdrawal from receiving Notices of Electronic Filing from the Court's CM/ECF filing system for this action is attached hereto as **Exhibit A**.

WHEREFORE, Emma L. Persson, respectfully request that this Court enter an order permitting her withdrawal as counsel of record and withdrawal as recipient of the Notices of Electronic Filing from the Court's CM/ECF filing system for this action.

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Dated: July 27, 2021

Respectfully submitted,

/s/ Emma L. Persson

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*Counsel to Shell Offshore, Inc., Shell Oil
Company, Shell GOM Pipeline Company,
LLC, and Shell Pipeline, LLC*

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing document upon the counsel and parties of record, electronically through the Bankruptcy Court's Electronic Case Filing System on those parties that have consented to such service, on the 27th day of July 2021.

/s/ Emma L. Persson

Emma L. Persson